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GPT/BNSF Custer Spur EIS
Co Lead Agencies c/o CH2MHILL
1100 112th Avenue NE , Suite 400
Bellevue, WA 98004

The Gateway Pacific Terminal and Custer Rail Spur Project is a large project in many areas.

- This proposal for the Gateway Pacific Terminal and six mile Custer Rail Spur in Whatcom County Washington is 54 MMSTPY(Million Short Tons Per Year) of the 1,070 MMSTPY Production or 5.0 % of the total US Coal Production

- The project cost is $600 Million US dollars

- This project is 12 % of the Sub Bituminous Western Low Sulfur Coal Production in 2003 that is being produced at significantly higher volumes than historical production due to expanded demand for this environmentally clean product.

- This project impacts several Western States (Washington, Oregon, Idaho, Montana, Wyoming, and South Dakota) , Rail Lines, River Barge Shipping and Export/Import Ships for Asian Ports

I attended the public meeting in Vancouver Washington on December 12, 2012 and I am expressing my views only as a private citizen and not affiliated to any organization or special interest group either for or against the proposed Gateway Pacific Terminal and six mile Custer Rail Spur Project. My background as a Bachelor of Science in Chemical Engineering and several courses towards a Masters of Engineering Degree offers credibility to my comments.

I have over 35 years of industrial experience working in the natural gas business as an Environmental Engineer, Process Engineer, Safety Engineer as well as a management position responsible for a workforce of 115 employees. As a Registered Professional Engineer in the State of Texas, I am recognized by my peers to uphold the codes and regulations of engineering.

I offer these comments on the proposed Gateway Pacific Terminal and six mile Custer Rail Spur Project.

Sincerely,

William A. Brake
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IMPACTS

Noise - Rail

I live less than 2,500 feet from BNSF Rail line and noise is an issue with the current trains. The warning horn at a grade crossing at the BNSF and NW 122nd Street in northwest Vancouver is a constant irritation. The noise of the engines, rail cars and warning horn starts well before the grade crossing from either direction and local neighborhood organizations have looked to make this a "quiet - low impact zone" but the upgrade costs for enhanced visibility and signage is over $10,000 related to the removal of the steep terrain near the tracks and if additional safety lights and full road cross arms are added it is as much as $100,000 project. The freight trains move at a slower speed in our area than does the AMTRAC passenger train which requires a greater safety zone.
If I can hear the noise of the current Freight and Passenger Trains now at 2,500 foot (½ mile) I ask you to review the noise impact of adding additional trains related to this project.

Noise – River Traffic

I live less than 2,500 feet (1/2 mile) from the Columbia River Shipping Channel and Barges, Tugs as well as large ocean going ships are daily on the river. Most of the year they do not impact my residence but lately there has been fog and the noise of horns on the river is an increasing irritation. Since I live at a considerable distance from the Columbia Shipping Channel, the noise of the passing river freight is even more noticeable for the many residences closer to the Columbia River in the states or Oregon and Washington for a distance of over 200 miles.

Air Quality - Rail

Diesel Emissions in the pristine 200 mile long Columbia River basin are a concern as well as in the urban areas with high population density. A typical unit coal train would have six locomotives rated at 5,000 HP each and are a rolling environmental emission source. A 30,000 HP Diesel Engine equivalent in a fixed based industrial operation has the highest level of environmental permitting, review, and compliance criteria. However this "Rolling Stock" Emission Source hardly is noticed by the general public. If ten trains a day are planned for this project then on a yearly basis this is in the very large horsepower category.

As an alternative to the Diesel Locomotive Emissions from the Powder River Basin mines to the proposed Washington Seaport at the Gateway Pacific Terminal and the return trip back to the Powder River Basin mines a change to a cleaner burning Liquefied Natural Gas (LNG) Fuel is suggested. The Williams Company (Stock Symbol WMB) has the Plymouth LNG Plant in the Tri City Area of South East Washington with Seasonal Storage Capacity of 13 BCF that could be a refueling point between the Powder River Basin and the Export Terminal in both directions. Natural Gas is a significantly cleaner burning fuel significantly reducing emissions and results in a significant savings in maintenance costs.

Typical distances for the trains would be from the Powder River Basin mines to the Export Terminal is 1,600 miles. Breaking down by segments, the Powder River Basin Mines to Plymouth Washington is 1,136 miles and The Plymouth, Washington LNG Plant to Vancouver, Washington is 194 miles. Vancouver Washington to the Export Terminal is 270 miles. The

LNG Terminal would be at a point to benefit the Columbia River Gorge Environmental Area as well as to the routes in the state of Washington.

I strongly urge the review of alternate fuels for the Rail Traffic for this project.

Human Health - Rail

Western Coal is crushed and sized and is not washed prior to shipment resulting in more dusting operations. Eastern coal is washed requiring great quantities of water. With the open rail cars the dusting and loss of coal dust is of great concern. It is recommended that this dusting be evaluated for the entire 1,600 mile one way trip.

Empty Rail Cars on the return trip to the Powder River Basin mines still have locomotive diesel emissions and blowing coal dust from the open rail cars. The impact of the empty rail cars needs to be addressed in the environmental impact statement as they are not 100 percent empty but contain residual coal, and coal dust byproducts.

Traffic Safety - Rail

The BNSF Rail Line and NW 122nd Street in Northwest Vancouver has multiple boat storage and occupied living areas on the water and adjacent lands. A recent trip indicates about 25 mobile residences and 50 floating residences. The properties are occupied year round and are the closest impact area to my residence in Vancouver some 2,500 feet away. The current grade crossing is minimal at best and additional rail traffic related to the Coal Train Project makes this crossing even more dangerous. I am sure there are many grade crossings along the entire rail route from the mines to the export terminal, but this specific crossing is dangerous now with minimal cross arm length, sight visibility in both directions and the ability to hear an approaching train horn. The impact of additional trains will make this neighborhood grade crossing even more dangerous.

Ships – Endangered Species

The pristine waters of the Friday Harbor Washington Area attract many endangered species such as the Orca Whales. The numbers are counted and documented to be 89 Orcas and each one is named and unique. The age of the Orcas is as much as 104 years. The additional ship traffic in the area could have an impact on the livelihood of the Orca species. The impact is unknown without detailed study.

America First

American coal resources are not infinite. Especially in high demand is the Western coal for its clean burning properties. With this Gateway Pacific Terminal Project to transport 54 MMSTPY clean burning low sulfur western sub bituminous coal to Asian markets may be good for the world environmentally but could have a long term impact on the availability of this product.
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In 1973 in the United States there were 4,744 mines and currently in 2004 only 1,316 remain for a significant reduction in number of mines and manpower requirements.

US Employment peaked at 152,000 and is currently 71,000 (47 %) due to mechanization of mining operations and the change to more surface versus underground mines.

In 2003, One Million BTU of coal sold for $0.87 on average, compared to $4.41 for natural gas and $4.75 for crude oil.

Coal Production in Million Short Tons Per Year

TYPE	CURRENT PRODUCTION 2003	PEAK PRODUCTION	PERCENT OF PEAK PRODUCTION
Bituminous – Eastern Fields	541.5	653 (Year 1997)	82 %
Sub Bituminous – Western Fields	442.6	442 (Year 2003)	100 %
Lignite – Dakotas and Gulf Coast	86.4	89.5 (Year 1993)	96 %
Anthracite – Pennsylvania	1.3	44.1 (Year 1950)	3 %
Total	1071.8		

As can be seen from this table, the days of Anthracite from Pennsylvania are long gone and have been declining for over 60 years. The Bituminous Eastern Fields coal peaked in 1997 and is on a rapid decline with a reduction of 20 % in a short six year period.

Lignite has peaked also and the only growth industry is the Western sub Bituminous Coal.

Should this Western American Coal be sold to Asia for a very small price?